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April 2, 2020

BY ELECTRONIC MAIL

The Honorable Nelson S. Roman
The Hon. Charles L. Bricant Jr.
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: United States v. Markel Green; 17 Cr. 506 (NSR)

Dear Judge Roman:

I represent Markel Green in the above-referenced matter, having been appointed pursuant to the provisions of the Criminal Justice Act (“CJA”), 18 U.S.C. § 3006A on September 7, 2017. Mr. Green is named in a multi-count indictment that charges him and 11 others with participating in a racketeering conspiracy, in violation of 18 U.S.C. Section 1962(d) and a homicide, in violation of 18 U.S.C. Section 1959(a)(1). After months of negotiations, Mr. Green pleaded guilty on January 8, 2020 to a two-count superseding information, which included his participation in a homicide that occurred on December 23, 2012. He faces a maximum sentence of 25 years’ incarceration. Sentencing is presently scheduled for April 17, 2020.

The purpose of this application is to respectfully request that the Court adjourn sentencing until after June 1, 2020. In light of the COVID-19 pandemic, our preparation for sentencing has been significantly impacted. Orange County Jail (“OCJ”), where Mr. Green is detained, suspended visits on March 7, 2020. While OCJ has video-conferencing, we have been unable to utilize this service because of technical issues with the video-conferencing equipment in Mr. Green’s housing unit. Additionally, we have been unable to conduct in-person interviews in Poughkeepsie with Mr. Green’s family members and others who have relevant sentencing information.

I have discussed this request with Probation Officer Sara Willette and asked her to delay the final disclosure of the pre-sentence report as we have been unable to discuss the initial draft with Mr. Green. Should the Court grant the instant request, I also respectfully

request that the date for the final disclosure of the pre-sentence report be extended to three weeks before the new sentencing date.

Thank you for your consideration.

Respectfully submitted,

/s/

Anthony Cecutti